

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	Bankruptcy No. 19-34886
)	
MICHAEL HAYWOOD,)	Chapter 13
)	Hon. Jacqueline P. Cox
Debtor.)	
)	Date: 6/15/2020 at 9:00 a.m.

NOTICE OF MOTION

To: Michael Haywood	David M. Siegel & Associates	Tom Vaughn
10602 S. Longwood Drive	790 Chaddick Drive	55 E. Monroe Street, Ste 3850
Chicago, IL 60643	Wheeling, IL 60090	Chicago, IL 60603
Via U.S. Mail	Via CM/ECF	Via CM/ECF

PLEASE TAKE NOTICE that on June 15, 2020, I shall appear before the Honorable Jacqueline P. Cox, in Courtroom 680 at the United States Bankruptcy Court, Northern District of Illinois, 219 S. Dearborn, Chicago, Illinois, via telephone, and shall there and then present the attached: Motion of Demitrius Haywood for Agreed Order Modifying Automatic Stay, at which time you may appear and be heard. This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.CourtSolutions.com or by calling Court Solutions at (917) 746-7476.

A party who objects to this motion and wants it called must file a Notice of Objection no later than two (2) business days before the presentment date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion without a hearing before the date of presentment

By: /s/ Peter L Berk

Peter L. Berk, Esq. #6274567
Helena Milman, Esq. # 6294473
O'KEEFE, RIVERA & BERK, LLC
55 W Wacker Drive, Suite 1400
Chicago, Illinois 60601
312/758-1121

PROOF OF SERVICE

I, Peter L Berk, an attorney, certify that a copy of the foregoing Notice and document to which it refers were sent to all parties listed above via CM/ECF, or via U.S. Mail, postage prepaid, by depositing a copy of same in the U.S. Mail Box at 55 W Wacker Drive, Chicago, IL, on the 3rd day of June, 2020.

/s/ Peter L Berk

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**MOTION OF DEMITRIUS HAYWOOD FOR AGREED ORDER MODIFYING THE
AUTOMATIC STAY TO PROCEED WITH DISSOLUTION OF MARRIAGE**

NOW COMES DEMITRIUS HAYWOOD, Debtor's spouse, by and through her attorney, Peter L Berk, and for her Motion for Agreed Order Modifying the Automatic Stay to Proceed with Dissolution of Marriage, states as follows:

1. On December 5, 2018, Mrs. Haywood filed Petition for Dissolution of Marriage with the Circuit Court of Cook County, Case No. 2018 D 010657, currently pending.
2. On December 11, 2019, Debtor filed his Chapter 13.
3. The Circuit Court Judge presiding over the marital dissolution cases in Cook County routinely informed the parties that they cannot finalize dissolution proceedings without an order modifying the automatic stay in Chapter 13 cases.
4. To avoid any delay in the dissolution of their marriage, Mrs. Haywood seeks to lift the automatic stay in Debtor's case.
5. Mrs. Haywood believes that the stay relief requested herein will not affect the ability of the Debtor to make Plan payments or to complete his Chapter 13 cases.
6. Debtor agrees to entry of the order modifying automatic stay in his case to proceed with the divorce.

WHEREFORE, Demetrius Haywood, prays that this Court enter the agreed order appended to this Motion modifying the automatic stay in Debtor's bankruptcy case so that the Debtor and Demetrius Haywood, may finalize their divorce proceedings.

Respectfully submitted,

DEMITRIUS HAYWOOD

By: /s/ Peter L. Berk
Debtor's Attorney

Peter L. Berk, Esq. #6274567
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